

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ContentGuard Holdings, Inc.

*Plaintiff,*

v.

Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.

*Defendants.*

Civil Action No. 2:13-cv-01112-JRG

JURY TRIAL DEMANDED

**NOTICE OF COMPLIANCE WITH THIRD-PARTY PRODUCTION PROVISIONS BY  
HTC CORPORATION AND HTC AMERICA, INC.**

Pursuant to paragraph 12 of the Amended Protective order, Defendants HTC Corporation and HTC America, Inc. file this notice that it produced third-party confidential information and verifies as follows:

1. Innovative Patented Technology, LLC (“IPT”): HTC notified IPT of its intent to produce IPT’s confidential documents by letter dated September 17, 2014, sent via Federal Express. The letter informed IPT of the specific items to be produced and included the Amended Protective Order. The package sent to IPT via Federal Express was returned due to an outdated address. A second letter was sent to IPT on September 30, 2014, via certified mail, to an address in Rancho Santa Fe, California, after research on the internet. IPT has not contacted HTC to discuss any objections to the production under the confidentiality designation “Confidential - Outside Attorneys’ Eyes Only.”

2. Memory Control Enterprise, LLC: HTC notified Memory Control Enterprise of its intent to produce Memory Control Enterprise's confidential documents by letter dated September 17, 2014, sent via Federal Express. The letter informed Memory Control Enterprise of the specific items to be produced and included the Amended Protective Order. The package sent to Memory Control Enterprise via Federal Express was returned due to an outdated address. A second letter was sent to Memory Control Enterprise on September 29, 2014, via certified mail, to an address in Rancho Santa Fe, California, after research on the internet. Memory Control Enterprise has not contacted HTC to discuss any objections to the production under the confidentiality designation "Confidential - Outside Attorneys' Eyes Only."

DATED: November 3, 2014

Respectfully submitted,

By: /s/Peter J. Wied  
Peter J. Wied

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on November 3, 2014. *See* Local Rule CV-5(a)(3)(A).

/s/Peter J. Wied

Peter J. Wied